3.0 Introduction to the Initial Study

3.1 Proposed Project Overview

Pursuant to the California Public Utilities Commission's (CPUC) General Order 131-D, San Diego Gas & Electric Company (SDG&E), a regulated California utility, filed an application (A.17-06-029) with the CPUC on June 28, 2017, for a Permit to Construct (PTC) the TL674A Reconfiguration and TL666D Removal Project (proposed project). The application includes the Proponent's Environmental Assessment prepared by SDG&E pursuant to the CPUC's Rules of Practice and Procedure Rule 2.4 (CEQA Compliance). The CPUC deemed the application complete on September 27, 2017.

The proposed project would consist of the following four components:

TL674A Reconfiguration: Removal of approximately 700 feet of 69-kilovolt (kV) overhead tap; installation of about 1.1 miles of underground duct bank with four vaults to connect TL674A (renamed TL6973 as part of the project) to the Del Mar Substation.

TL666D Removal: Removal of approximately 6 miles of 69-kV overhead power line between the Del Mar Substation and the intersection of Vista Sorrento Parkway and Pacific Plaza Drive.

C510 Conversion: Conversion of approximately 3,900 feet of existing 12-kV overhead distribution line to an underground configuration within San Dieguito and Racetrack View Drive; removal of five poles adjacent to Racetrack View Drive; and installation of several poles to connect existing overhead lines to new underground configuration.

C738 Conversion: Conversion of approximately 630 feet of existing 12-kV overhead distribution line to an underground configuration within the Sorrento Valley multi-use path, with removal of distribution line poles and installation of several new poles and risers.

The proposed project would address the safety, environmental quality, and reliability of the local area electrical network, allowing SDG&E to meet internal design standards as well as industry standards.

3.2 Environmental Analysis

3.2.1 CEQA Lead Agency

The CPUC is the lead agency for review of the proposed project under CEQA because the CPUC is the agency that must decide whether to adopt the Mitigated Negative Declaration (MND) and to approve or deny the Permit to Construct.

3.2.2 Initial Study Purpose

This Initial Study (IS) has been prepared pursuant to the California Environmental Quality Act (CEQA), the amended State CEQA Guidelines (14 California Code of Regulations 15000 et seq.) and the CPUC CEQA rules (Rule 2.4). As described in Section described in Section 15063 of the CEQA Guidelines, an Initial Study serves as a preliminary investigative tool to identify potential environmental effects. It is recommended as the basis for determining whether to prepare an EIR, which is supported by evidence in the record, all potentially significant impacts associated with proposed construction, operation and maintenance of the project can be mitigated to levels below significance; therefore, the CPUC may adopt an MND in accordance with Public Resources Code section 21080.

3.2.3 Initial Study Content

The CEQA Guidelines reflect the requirements set forth in Chapter 3, Title 14 of the Public Resources Code and provide objective criteria and procedures for the orderly evaluation of projects and the preparation of environmental impact reports, negative declarations and mitigated negative declarations by public agencies, such as the CPUC. The Guidelines address legislative directives and initiatives, reflect court decisions interpreting the CEQA statute and incorporate practical planning considerations in environmental analyses. The Initial Study's analyses are based on information from SDG&E's Preliminary Environmental Assessment and associated submittals, a site visit, CPUC data requests, and additional research. The content and analysis in this Initial Study is based on the current CEQA Guidelines Appendix G environmental checklist, which includes 89 questions contained in the 19 topics presented below.

- Aesthetics
- Agricultural Resources
- Air Quality
- Greenhouse Gases
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Traffic and Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

3.2.4 CEQA Guidelines and Appendix G Environmental Checklist Update

In 2013, the Governor's Office of Planning and Research (OPR) initiated a comprehensive, multi-year effort aimed at updating the CEQA Guidelines and Appendix G environmental checklist. The reasons supporting the update are multifold: lawmakers have recently adopted various legislation amending the CEQA statute and Guidelines, including major reforms pertaining to the metrics used in evaluating transportation impacts to the introduction of new environmental topics on the environmental checklist,

such as tribal cultural resources resulting from recent legislation (AB 52). The California Supreme Court has also published several decisions that affect the CEQA practice Guidelines.

The proposed amendments to the CEQA Guidelines fall into two categories: (1) those dealing with efficiency and organizational improvements, and (2) those that represent major substantive improvements. The emphasis of this review is to focus on those changes to the Guidelines that could represent new information or result in effects of substantially greater severity than those evaluated for the proposed project using the current Appendix G environmental checklist. Potential efficiency improvements address: using regulatory standards in the CEQA process; determining whether a project is "within the scope" of a program EIR; clarifying how and when tiering rules apply; detailing how and when to use certain environmental exemptions; and amendments pertaining to remand and remedies for projects subject to injunction or other court action. The emphasis of this review would be restricted to the changes to Appendix G, environmental checklist.

The amendments would eliminate some duplicative questions and some issues would be reorganized. For example, the Guidelines currently include two questions pertaining to whether a project would conflict with a habitat conservation plan and other related plans in two separate sections: biological resources and land use planning. OPR proposes to delete the question from the land use planning section. The question in the biological resources section would remain unchanged. As currently proposed, the amendments would relocate questions related to paleontological resources from cultural resources to geology as directed in Assembly Bill 52 (Gatto, 2014). These changes would not materially affect the conclusions reached in this study relating to biological resources, cultural resources or land use (see Sections 5.4, 5.5 and 5.10 for more information).

With respect to population growth, Appendix G currently asks whether a project would cause substantial population growth. This would be changed if the current amendments were adopted to ask whether such growth would be *unplanned*. Planned growth may result in environmental effects, though these impacts are assumed to be in analyzed in connection with a land use plan or regional plan accounting for that population growth. Unplanned growth is assumed to occur in an absence of plan or program that could cause significant effects on the environment. As described in Section 5.13 of the Initial Study, the proposed project would not induce growth or displace numbers of people or housing. The proposed project would involve utility reliability and maintenance activities. It would not generate population growth directly nor would it result in availability of surplus energy resources that could indirectly induce population growth. No changes to the project's less-than-significant impacts would be warranted by the adopting amended Guidelines.

The Guidelines propose an amendment to Aesthetics by revising the question whether a project would "degrade the existing visual character of a site." Given the difficulty in often analyzing this potential impact objectively, OPR proposes to revise the criterion to ask whether the project is consistent with zoning or other regulations governing visual character. Because the proposed project is not subject to local zoning or any other similar local land use regulation, the proposed checklist amendment would not apply to the project's analyses or the less-than-significant conclusions reached for the topic of aesthetics.

Major substantive improvements include guidance regarding how to analyze a project's energy usage and impacts. Previously located in Guidelines Appendix F and often limited to EIRs, the energy impact analysis would now be included in Appendix G and require agencies to address energy consumption as part of all of their CEQA processes. The Checklist would be amended to include the following questions: Would the project result in potentially significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation, or, conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed project would involve electric utility line reconfiguration, removal, and maintenance. Most of the proposed project's energy consumption would occur during construction activities and primarily associated with fuel consumption from vehicle trips and construction equipment use. The proposed project would not involve consumption of other sources of energy, such as electricity or natural gas. As described in Section 4.7, Greenhouse Gases, the proposed project would be required to comply with federal and state standards addressing fuel efficiency for light- and heavy-duty vehicles. Additionally, the increasingly stringent state and federal regulations on engine efficiency combined with local, state, and federal regulations limiting engine idling times from equipment would further reduce the amount of fuel demand during project construction. As shown in Section 4.7, the project would not conflict with relevant plans involving renewable energy and energy efficiency, such as the statewide Climate Change Scoping Plan, the San Diego Association of Government's 2014 Regional Energy Strategy, and the City of San Diego Climate Action Plan. Because the proposed project would avoid the wasteful and inefficient use of transportation fuel and would not conflict with state and local policies on renewable energy and energy efficiency, impacts to energy resources would be less than significant.

The Checklist adds new questions related to transportation and wildfire, pursuant to Senate Bill 743 (Steinberg, 2013), and Senate Bill 1241 (Kehoe, 2012), respectively as well as water demand. Proposed Guidelines Section 15064.3, "Determining the Significance of Transportation Impacts" addresses the use of Level of Service as a metric for determining the significance of transportation impacts under CEQA and phases that out by the year 2020. After that time agencies would use a "vehicle miles traveled" (VMT) metric to evaluate transportation effects. This metric better aligns with tracking other statewide environmental goals, such as reducing greenhouse gases. Projects that reduce VMT will be presumed to have a less than significant impact. This section also discusses the modeling that may be used to analyze VMT. As discussed in Section 5.16, Transportation, the analysis conducted for this project anticipated this regulatory changed and addressed it appropriately. The implementation of VMT as the metric for determining the significance of transportation impacts would not affect the analysis or conclusions reached for the project's transportation impacts evaluated in Section 5.16 in this IS/MND.

Proposed Guidelines Section 15155(f) would require agencies to consider the degree of certainty that exists regarding project water supplies throughout the life of the project. Agencies must also evaluate the pros and cons of a project based on water demand. If an agency cannot determine that water will be available for the life of the project, potential alternative water supplies and their respective environmental impacts must be evaluated. The project's water demands relate primarily to water needed for fugitive dust suppression. The applicant provided a detailed breakdown of the assumptions undergirding the up to 707,000 gallons of water that could be required for purposes of suppressing dust on unpaved roads and in

and around work areas. The proposed amendment would be satisfied with the water demand estimates that have been disclosed in Section 5.18, Utilities and Service Systems.

3.2.5 Initial Study Organization

The IS has been organized into the following sections:

- **Chapter 3.0: Introduction.** Provides an introduction and overview of the proposed project and the CEQA process, and identifies key areas of environmental analysis.
- **Chapter 4.0: Project Description.** Presents the project objectives and provides an in-depth description of the proposed project, including construction details and methods.
- **Chapter 5.0: Environmental Setting and Impacts**. Includes a description of the existing conditions and the analysis of the proposed project's potential environmental impacts, and identifies mitigation measures to reduce potentially significant impacts to less-than-significant levels.
- **Chapter 6.0: Mitigation Monitoring and Reporting Plan.** Identifies the monitoring requirements for applicant proposed measures, mitigation measures that SDG&E must implement as part of the proposed project, actions required in order to implement these measures, as well as monitoring requirements and the timing of implementation for each measure.
- **Chapter 7.0: List of Preparers.** Includes the list of professionals involved during preparation of the IS/MND.
- **Appendices:** Includes air quality and greenhouse gas emissions estimated from the California Emissions Estimator Model (CalEEMod), including tabulation of helicopter emissions; biological survey reports; master table of special status species occurrence potentials; cultural resources documentation; database search records of hazardous materials sites; land use policy matrix; tribal consultation correspondence; paleontological technical study; and detailed project components maps.

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